

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA, : Case No. CR-1-02-168-02
Plaintiff, :
vs. : Judge Beckwith
RICHARD LIGGETT, :
Defendant. :

MOTION FOR RELEASE OF BOND OBLIGATION

Now comes the Defendant Richard Liggett, by and through counsel, and hereby moves the Court to order the United States District Court Clerk's Office for the Southern District of Ohio to release Mr. Liggett's passport which was surrendered as a condition of bond in the above-referenced case.

As background, on February 27, 2004, this Court sentenced Mr. Liggett to a term of incarceration of twelve months and one day based upon convictions for two counts of wire fraud pursuant to 18 U.S.C. § 1343. During the pendency of the case before this Court, Mr. Liggett was released on bond, but a condition of his bond required that he surrender his passport to the District Court. As of the date of this motion, Mr. Liggett has completed his term of imprisonment as imposed by the Court.

Because Mr. Liggett complied with all of the conditions of his pretrial release and the criminal charge against him has been completely resolved, release of the passport is appropriate. Accordingly, Mr. Liggett respectfully requests that this Court order the clerk's office to return the passport to Mr. Liggett. Mr. Liggett currently resides in Baltimore, Maryland, and requests that the

Court order the release of the passport to undersigned counsel.

Counsel for Mr. Liggett has spoken with Deputy Criminal Chief Ralph Kohnen and he has no objection to the return of the passport.

Respectfully submitted,

STEVEN R. KELLER
FEDERAL PUBLIC DEFENDER

s/ Richard Smith-Monahan
Richard Smith-Monahan (0065648)
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Attorney for Defendant
Richard Liggett

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Ralph Kohnen, Deputy Criminal Chief, by regular mail, on this 21st day of March, 2005.

s/ Richard Smith-Monahan
Richard Smith-Monahan